

I, Suzanne Brown, to hereby state, declare and depose that the following information is true and correct to the best of my knowledge and memory.

1. My name is Suzanne Brown. I was born in Sikeston, Missouri on October 30, 1950. I currently reside at 1111 Basswood Lane, Olivette, MO 63132. I am attorney licensed to practice law in the State of Missouri. My office is located at 9300 Olive Blvd., Olivette, MO 63132.
2. On November 25, 2014, I was observing a protest demonstration as a part of the National Lawyers Guild Legal Observation Team. I was accompanied by another attorney acting as a Legal Observer, David Harris. At slightly after 2:00 p.m., the demonstrators walked up an off ramp of Highway I-70/I-44 just north of the MLK Bridge in downtown St. Louis, Missouri.
3. All but a few protesters lined up to block the south bound lane of the highway. A small number of protesters sat down on the road and the others stood immediately behind them. A large number of police in riot gear lined up facing the protesters approximately 20-30 feet from them. I was standing to the south of the protesters and almost even with the police line. I was standing in back of a concrete barrier. There were perhaps 20 or so people standing behind the barrier near me as the great majority of demonstrators were standing across the highway behind the sit-downers.
4. Shortly after the sit-down protesters sat down, the police officers began to approach the crowd in unison. I could not read any names on the front of the police officers uniforms, but I could see that they each had a pseudonym taped to the backs of their helmets such as Mr. Green, Mr. Blue, Mr. Pink, Mr. White, Mr. Red, etc.
5. As the police began to approach the protesters, a demonstrator who was standing immediately to my right on top of the concrete barrier began shouting loudly and repeatedly to the police, "You'd better get used to this." He repeated this shout at least 5 or 6 times.
6. Without any warning, one of the police officers who was standing slightly to the rear of the police formation turned towards the barrier, approached, and without saying a word, pepper sprayed the individual who had been shouting. Because I was standing next to that man, I also was sprayed, as well as other people who were standing nearby. The people standing in back of the barrier immediately ran to the exit ramp causing a small stampede. After wiping off what spray I could, I returned to the barrier, but I could not identify the police with the spray, although I did get a distant photograph of him holding his spray can before he began walking towards us.
7. Shortly thereafter, the police in formation began to pepper spray the sit-downers and standing demonstrators behind them to get them to move. The disabled sit-downers were arrested and handcuffs and removed from the scene. At that time, the protesters left the site and moved to the bottom of the exit ramps to continue their demonstration.

The above statement is true and correct to the best of my knowledge and memory, and is given under penalty of perjury.

Suzanne Brown  
Suzanne Brown

12/03/2014

Subscribed and sworn to before me this  
3<sup>rd</sup> day of December, 2014.

Notary

Wesley Schooler

